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6 Attorneys for Defendant,
7 FAMILY DOLLAR, INC.

8
9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 DAVID SMITH,

12 Plaintiff,

13 vs.

14 FAMILY DOLLAR, INC., a North
15 Carolina Corporation; DOES I through X;
16 and ROE BUSINESS ENTITIES I through
X, inclusive,

17 Defendant.

Case No.: 2:15-cv-00945-JCM-PAL

**[PROPOSED] STIPULATION AND
ORDER TO EXTEND TIME FOR
DEFENDANT FAMILY DOLLAR, INC. TO
ANSWER OR OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT**

[FIRST REQUEST]

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19 Plaintiff DAVID SMITH (hereinafter "Plaintiff") and Defendant FAMILY DOLLAR, INC.
20 (hereinafter "Defendant"), by and through their respective counsel of record, hereby stipulate and
21 agree to extend the time for Defendant to answer or otherwise respond to Plaintiff's Complaint, up to
22 and including June 17, 2015.

23 This extension is necessary to provide adequate time for recently retained counsel for
24 Defendant to receive and review necessary information in order to prepare an answer or to otherwise
25 respond to the Complaint. This is the first request for an extension of time to answer or otherwise
26 respond to the Complaint.

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1 The parties agree and represent to the Court that this request is made in good faith and not for
2 the purpose of delay.

3 Dated: May 22, 2015.

Dated: May 22, 2015.

4 Respectfully submitted,

Respectfully submitted,

5
6 /s/ James P. Kemp
7 JAMES P. KEMP, ESQ.
KEMP & KEMP

/s/ Crystal J. Herrera
WENDY MEDURA KRINCEK, ESQ.
CRYSTAL J. HERRERA, ESQ.
LITTLER MENDELSON, P.C.

8
9 Attorney for Plaintiff,
DAVID SMITH

Attorneys for Defendant,
FAMILY DOLLAR, INC.

10
11 **ORDER**

12 **IT IS SO ORDERED.**

13 Dated: _____, 2015.

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16 _____
17 UNITED STATES MAGISTRATE JUDGE
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